

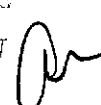
1 **RAJI RAJAN, ESQ., CSB#139834**  
2 **LAW OFFICES OF RAJI RAJAN**  
3 **355 WEST OLIVE AVENUE, SUITE 101**  
4 **SUNNYVALE, CA 94086**  
5 **Telephone: 408-730-9492**  
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7 **Attorney for Marry C. Hugdahl**

**FILED**

2008 JAN 30 P 3:10

RICHARD W. WIEKING  
CLERK  
U.S. DISTRICT COURT  
NO. DIST. OF CAL. S.J.



10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN JOSE DIVISION**

*clerk*

14 ANNUITY & LIFE REASSURANCE )  
15 AMERICA INC. (formerly known as )  
16 CAPITOL BANKERS LIFE INSURANCE )  
17 COMPANY), )

18 Plaintiff,  
19 vs. )

CASE NO.: C 07 5502 *pvt*  
ANSWER TO THE  
COMPLAINT FOR  
INTERPLEADER AND  
DECLARATORY RELIEF

20 JON C. HUGDAHL, an individual and )  
21 TRUSTEE of the JON S. HUGDAHL )  
22 FAMILY TRUST, dated 12/19/94; )  
23 PAUL A. HUGDAHL, an individual; and )  
24 MARRY C. HUGDAHL an individual, )

25 Defendants. )  
26 /

27 1. Defendant denies BECAUSE OF LACK OF SUFFICIENT INFORMATION OR  
28 BELIEF TO ANSWER, each allegation to the following numbered paragraphs of the

ANSWER TO THE COMPLAINT FOR INTERPLEADER AND DECLARATORY RELIEF  
CASE NO.: C 07 5502



1 complaint.

2 Paragraph 1, 5,6, 13a, 13b., 14,15,16.

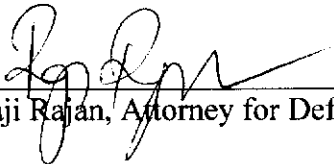
3 2, Defendant believes to be true the allegation to the following numbered  
4 paragraphs of the complaint.

5 Paragraphs 2, 3, 4, 7,8,9,10,11, 12

7 Wherefore, the defendant MARRY C. HUGDAHL prays for a judgment as follows.

- 9 1. Defendant requests to deny the attorney fees and costs to plaintiff.
- 10 2. Defendant requests to award to defendant the community share of the insurance
- 11 proceeds.
- 12 3. Defendant requests for further relief as the Court may deem proper.

14 January 28, 2008

  
Raji Rajan, Attorney for Defendant

17 VERIFICATION

18  
19 I am the defendant in this matter. I have read the foregoing Complaint on Interpleader and  
20 know the contents thereof. It is true to the best of my knowledge, and on the basis of records  
21 and factual information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is  
true and correct.

22 EXECUTED ON JANUARY 27, 2008, SUNNYVALE, CA 94086

23  
24   
25 MARRY C. HUGDAHL



PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

I am a resident of the State of California, I am over the age of eighteen years and not a party to the within action; my business address is 355 West Olive Avenue, Suite 101, Sunnyvale, CA 94086.


On the date executed below. I served the within copies of the ANSWER TO THE INTERPLEADER on the parties in the said action by placing a true copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, in the United States mail at Sunnyvale, addressed as follows:

David L. Samuelson, Esq.  
897 Independence Avenue, Suite 2D  
Mountain View, CA 94043

Chris Ferry, Esq..  
Kelly, Herlihy and Klein  
44 Montgomery Street, Suite 2500  
San Francisco, CA 94101-4602

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 01/28/08 at Sunnyvale, CA 94086

  
\_\_\_\_\_  
Raji Rajan